

SURGICAL REVIEW CORPORATION Privacy Policy

Your privacy is very important to us. Please read below to see how Surgical Review Corporation ("SRC") handles information.

SRC respects your privacy and shares your concern about the security of information you may submit to SRC, either by using our website or by through our online applications and databases in conjunction with our accreditation programs, consulting and related services (collectively, the "Services"). Our privacy policy (the "Privacy Policy") explains the information we collect, how we use and share it, how to manage your information and your rights in connection with the Services. For participants in our various programs, please also see the Terms and Conditions and applicable Accreditation Agreement and/or Database Participation Agreement you entered into with SRC governing the Services.

SRC is headquartered in Raleigh, North Carolina, U.S.A. and our Services are provided to you by SRC. If you are a resident of the European Union ("EU") and you are a participant in one of our accreditation programs, you submit data to our database or you are receiving consulting services, SRC is the controller of your personal data for the purposes of EU data protection law.

This policy was written in English. To the extent a translated version conflicts with the English version, the English version controls. Unless indicated otherwise, this Privacy Policy does not apply to third party products or services or the practices of companies that we do not own or control, including other companies with whom you might interact or through the Services.

Questions or comments about this Privacy Policy may be submitted by mail to the address below or via email to: srcsupport@surgicalreview.org.

Surgical Review Corporation
Post Office Box 18136
Raleigh, North Carolina 27619
USA
Attn: Legal Affairs

Information SRC Collects

SRC collects information about you and processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our Services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice. We receive information in a few different ways, including when you access our website (www.surgicalreview.org), submit information for our accreditation programs, submit data to our databases or when you provide it to us electronically, by phone or via mail. For example:

- We collect basic account information such as your name, business address including street address, State or Province, Country, and postal code, email address, contact phone number, login and password.

- Depending on the specific Services you contract for, we may collect general de-identified information regarding surgical or medical procedures you perform. We do not collect or store identifiable patient information.
- We may collect payment information. We do not retain credit card information.
- We compile de-identified information on program participants, such as number and types of surgeries or procedures performed.
- We collect and store contracts you enter into with SRC and electronic communications between you and SRC.
- We also obtain additional third-party information about program participants from marketers, partners, researchers, and others. We may combine information that we collect from you with information obtained from public sources or third parties.
- We collect information from your browser, computer or mobile device to provide us with technical information when you access or use the Services. This technical information includes device and network information, cookies, log files and analytics information.

Cookies and Similar Technologies

When you visit our website (www.surgicalreview.org) or login to your account, a cookie will be stored on your computer. Generally, cookies and similar technologies work by assigning to your browser or device a unique number that has no meaning outside of SRC. SRC uses these technologies to personalize your experience and to assist in delivering content specific to your utilization of the Services. Additionally, after you've entered your login and password during a session, SRC saves that information so you don't have to re-enter it repeatedly during that session.

Most browsers automatically accept cookies. To manage the collection of information through cookies or other equivalent technology, you can use the settings on your browser or mobile device. Not accepting cookies may make certain features of the Services unavailable to you. SRC may also use your IP address to identify you, to administer the Services and to assist in diagnosing problems with SRC's servers.

Log and Usage Files

We may also collect information on how the Services are accessed and used. Stored information includes IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp and number of clicks. This information is used to analyze trends, administer, protect and secure the Services and gather broad demographic information for aggregate use. IP addresses, etc., may be linked to session IDs and device identifiers.

How We Collect, Use, Share and Otherwise Process Information

SRC relies on a number of legal bases to collect, use, share and otherwise process the information we have about you for the purposes described in this Privacy Policy, including:

- As necessary to provide the Services and to fulfill our obligations pursuant to the Terms and Conditions and any Accreditation Agreement and/or Database

Participation Agreement you have entered into with SRC. Generally, we cannot provide the Services unless we collect and use your information.

- Where you have consented to the processing, which you can revoke at any time. If you revoke your consent, we may no longer be able to provide the Services.
- Where necessary to comply with a legal obligation, a court order, or to exercise and defend legal claims.
- Where you have made the information public.
- Where necessary in the public interests.
- Where necessary for the purposes of SRC's legitimate interests.

Our Legitimate Interests

We process your information in furtherance of our legitimate interests, including:

- Providing and improving the Services. We do so as it is necessary to pursue our legitimate interests of providing and developing innovative and tailored offerings to our program participants on a sustained basis.
- Keeping the Services safe and secure. We do so as it is necessary to pursue the legitimate interests of SRC and its program participants to ensure the Services are secure, and to protect against fraud, spam and abuse.

How SRC Uses Information

SRC uses the information we collect and receive to administer and operate the Services and as otherwise described in this Privacy Policy. If you achieve accreditation in one or more of our accreditation programs, your information, including your name, business address, contact phone number and website address will be publicly available on our website.

We also use your information to analyze, develop and improve the Services. To do this, SRC may use third-party analytics providers to gain insights into how our Services are used and to help us improve the Services. We may also use your information to market the Services, provide support related to the Services, enforce our legal agreements with you and communicate with you.

SRC may de-identify or aggregate the information you make available in connection with the Services, in ways that do not personally identify you. Examples include information about procedures, equipment, usage and demographics.

We use your information to communicate with you about the Services, send you marketing communications or let you know about new features or updates to our programs. We also use your information to respond to you when you contact us.

How Information is Shared

Service Providers

We may share your information with third parties who provide services to SRC, such as supporting and improving the Services and processing payments. These service providers

will only have access to the information necessary to perform these limited functions on our behalf and are required to protect and secure your information.

Publicly Available Information

If you are accredited in one or more of our accreditation programs, your name, business address, phone number and website will be publicly accessible on our website unless you request us in writing not to post such information.

Third-Party Integrations

When you choose to use third-party software or electronic medical record systems that integrate with the Services, they may receive your information and content, including your personal information. Information collected by these third parties is subject to their terms and policies. SRC is not responsible for the terms or policies of third parties.

Legal Requirements

We may preserve and share your information with third parties, including law enforcement, public or governmental agencies or private litigants, within or outside your country of residence, if we determine that such disclosure is reasonably necessary to comply with the law, including to respond to court orders, warrants, subpoenas, or other legal or regulatory process. We may also retain, preserve or disclose your information if we determine that disclosure is reasonably necessary or appropriate to prevent any person from death or serious bodily injury, to address issues of national security or other issues of public importance, to prevent or detect violations of our legal contracts or to protect our operations or our property or other legal rights, including by disclosure to our legal counsel and other consultants and third parties in connection with actual or potential litigation.

DMCA Notices

We may share your information with third parties if we forward Digital Millennium Copyright Act (DMCA) notifications, which will be forwarded as submitted to us without any deletions.

How We Protect Information

We take several measures to safeguard the collection, transmission and storage of the data we collect. Although we strive to employ reasonable protections for your information that are appropriate to its sensitivity, we do not guarantee or warrant the security of the information you share with us, and we are not responsible for the theft, destruction, loss or inadvertent disclosure of your information or content. No system is 100% secure. We use industry standard Secure Sockets Layer (SSL) technology to allow for the encryption of personal information and credit card numbers. SRC uses a company that is an industry leader in online security and verification to strengthen the security of SRC's Services.

To help ensure that these measures are effective in preventing unauthorized access to your private information, you should be aware of the security features available to you through your browser. You should use a security-enabled browser to submit information to us with

respect to the Services. Please note that if you do not use an SSL-capable browser, you are at risk for having data intercepted.

Your Data Protection Rights Under the General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU), you have certain data protection rights. SRC attempts to take reasonable steps to allow you to correct, amend, delete or limit the use of your personal data and other information.

If you wish to be informed what personal data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.** You can access, update or request deletion of your personal data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where SRC relied on your consent to process your personal information. Please note that this may result in our inability to provide the Services to you.

You have the right to complain to a Data Protection Authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the EU.

Disclaimer

While SRC continues to work hard to protect your personal information, no data transmission over the Internet can be guaranteed to be absolutely secure, and SRC cannot ensure or warrant the security of any information you transmit to SRC. Transmitting personal information is done at your own risk.

Updating Account Information

You may correct, amend or update account information that is inaccurate at any time by adjusting that information in your account settings. If you need further assistance, please contact srcsupport@surgicalreview.org.

Transfers

The Services are provided from the United States. The information we collect and receive from you may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including personal data, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

SRC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Retention of Information

We retain information as long as it is necessary to provide the Services to you, subject to any legal obligations to further retain such information. Information associated with your accounts will generally be kept until it is no longer necessary to provide the Services or until you ask us to delete it or your account is terminated, whichever comes first. Additionally, we may retain information from terminated accounts to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the Terms of Service and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

Information about you that is no longer necessary and relevant to provide our Services may be de-identified and aggregated with other non-personal data to provide insights which are valuable to SRC, such as statistics of the use of the Services. This information will be de-associated with your name and other identifiers.

Privacy Policy Revisions

SRC reserves the right to modify this Privacy Policy at any time. Please review it occasionally. If SRC makes changes to this Privacy Policy, the updated Privacy Policy will be posted in a timely manner, and if we make material changes, we will provide a prominent notice. If you object to any of the changes to this Privacy Policy, you should stop using the Services and terminate your account.

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